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10 *Attorney for Plaintiff*

11 **UNITED STATES DISTRICT COURT**
12 **FOR THE DISTRICT OF ARIZONA**

13 Jennifer Marie Jones,

14 Plaintiff,

15 vs.

16 Town of Quartzsite; Jeffrey Gilbert and
17 Sondra Gilbert, Husband and Wife; Officer
18 Rick Paterson, #43; Officer Xavier Frausto,
19 #15, and Terry Frausto, Husband and Wife;
20 Denise Ann Florian; Individual Does I-X,

21 Defendants.

No. 2:12-CV-02629-PHX-LOA

**RESPONSE TO ORDER TO SHOW
CAUSE**

22 Plaintiff, through attorney Elmer Stewart Rhodes, hereby responds to the Court's
23 July 10, 2013 Order to Show Cause. Attorney Elmer Stewart Rhodes apologizes to the
24 Court for the delay in filing his application for admission pro hac vice and his formal
25 notice of appearance. He fully admits his error in not realizing he did not have a recent
26 Certificate of Good Standing on hand, which caused the delay in his filing an application
27 for admission pro hac vice. He did receive a certified Certificate of Good Standing in the
28 mail from the United States District Court for the District of Montana on July 17, 2013.
After receiving that Certificate of Good Standing, Attorney Stewart Rhodes electronically
filed a formal notice of appearance as attorney of record on behalf of Plaintiff, Jennifer

1 Marie Jones on July 18, 2013. On that same day he also filed an application for
2 admission pro hac vice, which is pending. Attached to that application was the Certificate
3 of Good Standing from the United States District Court for the District of Montana, dated
4 July 16, 2013. The \$50.00 fee for applying for admission pro hac vice has been paid to
5 the Clerk of the Court, with that payment sent via overnight UPS delivery on July 17,
6 2013.
7

8 Attorney Elmer Stewart Rhodes realizes the jeopardy his mistake and delay have
9 put his client's case in, and he hopes and prays that the Court will accept his apology and
10 his assurance that he will prosecute this case diligently and zealously on behalf of his
11 client, and will use the utmost diligence in complying with this Court's orders. The fault
12 lies with him, not his client, who is seeking redress for wrongful arrest. Though his
13 application for admission pro hac vice is still pending, attorney Elmer Stewart Rhodes
14 filed his Notice of Appearance as soon as possible after the application for admission was
15 filed to comply with this Court's orders as promptly as possible thereafter.
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19 RESPECTFULLY SUBMITTED this 19th day of July, 2013.

20 By /s/Elmer Stewart Rhodes
21 Elmer Stewart Rhodes
22 432 E. Idaho St., Suite C-231
23 Kalispell, Montana 59901
24 *Attorney for Plaintiff*
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CERTIFICATE OF SERVICE

I hereby certify that on the 19th day of July, 2013, I electronically transmitted the foregoing document to the Clerk's Office using the CM/ECF System for filing and transmittal of a Notice of Electronic filing to the following CM/ECF registrants:

Lisa S. Wahlin, Attorney for Defendants

By /s/Elmer Stewart Rhodes